

AARON D. FORD  
Attorney General  
STEPHEN J. AVILLO, Bar No. 11046  
Deputy Attorney General  
State of Nevada  
Public Safety Division  
100 N. Carson Street  
Carson City, Nevada 89701-4717  
Tel: (775) 684-1159  
E-mail: savillo@ag.nv.gov

*Attorneys for Defendant Timothy Hulsey and William Reubart*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

TOMMIE LEE MCDOWELL, JR.,  
  
Plaintiff,  
  
vs.  
  
HULSEY, et al.,  
  
Defendants.

Case No. 3:19-cv-00230-MMD-WGC

**ORDER GRANTING  
MOTION FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S "MOTION IN  
RE PROPER PROOF OF SERVICE  
PURSUANT TO FREDERICK HAMMEL  
IN RE FIRST AMENDED  
SUPPLEMENTAL CLAIM IV"  
(ECF No. 93)" (FIRST REQUEST)**

Defendants, Timothy Hulsey and William Reubart, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Stephen J. Avillo, Deputy Attorney General, hereby file this Motion for Extension of Time to Respond to Plaintiff's "Motion in re Proper Proof of Service Pursuant to Frederick Hammel in re First Amended Supplemental Claim IV" (ECF No. 93). This Motion is based on F.R.C.P. 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Defendants respectfully request an extension of seven (7) days, from March 22, 2021 until March 29, 2021, to respond to Plaintiff's above-described motion. This request for an extension has been made necessary by the pandemic restrictions, under which undersigned counsel has been working almost entirely from home and has suffered from information technology issues that have hampered efficiency.

///

1 Good cause supports granting this request. FRCP 6(b)(1) governs extensions of time and  
2 provides as follows:

3 When an act may or must be done within a specified time, the court may,  
4 for good cause, extend the time: (A) with or without motion or notice if  
5 the court acts, or if a request is made, before the original time or its  
extension expires; or (B) on motion made after the time has expired if the  
party failed to act because of excusable neglect.

6 The impact of the coronavirus pandemic constitutes good cause for an extension. Defendants'  
7 request will not hinder nor prejudice Plaintiff's case. Defendants therefore request a 7-day extension  
8 of the deadline to respond to Plaintiff's motion.

9 DATED this 22nd of March, 2021.

10 AARON D. FORD  
11 Attorney General

12 By: /s/Stephen J. Avillo  
13 STEPHEN J. AVILLO, Bar No. 11046  
14 Deputy Attorney General

15 *Attorneys for Defendant*

16 IT IS SO ORDERED.

17 DATED: March 23, 2021.

18 William G. Cobb  
19 UNITED STATES MAGISTRATE JUDGE  
20  
21  
22  
23  
24  
25  
26  
27  
28